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District of Nevada

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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOBBIE LOWE

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02619-GMN-VCF

**DEFENDANT'S UNOPPOSED MOTION FOR
EXTENSION OF TIME (FIRST REQUEST)**

1 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant")
2 respectfully requests a 30-day extension of time, from December 18, 2017 to January 17, 2018 for
3 Defendant to answer the complaint and submit the certified administrative record (CAR) in the above-
4 captioned case.

5 This is Defendant's first request for an extension of time. Defendant respectfully submits that
6 the requested extension is necessary to allow the Commissioner to prepare the CAR for submission to
7 this Court and parties in this action. It has taken longer than anticipated to prepare the CAR despite
8 the Commissioner's diligent efforts to have it ready in time. This request is made in good faith with
9 no intention to unduly delay the proceedings.

10 Counsel for Defendant conferred via email with Plaintiff's counsel, who indicated on
11 December 14, 2017 that Plaintiff does not oppose this motion or the requested extension.

12 Respectfully submitted,

13 Dated: December 14, 2017

14 STEVEN W. MYHRE
Acting United States Attorney

15 By: /s/ Margaret Branick-Abilla
16 MARGARET BRANICK-ABILLA
Special Assistant United States Attorney
Attorneys for Defendant

17 OF COUNSEL TO DEFENDANT:

18 DEBORAH LEE STACHEL
19 Regional Chief Counsel, Region IX

20 IT IS SO ORDERED:

21
22 
23 HON. CAM FERENBACH
24 UNITED STATES MAGISTRATE JUDGE

25 12-15-2017
26 DATED: _____

1 **CERTIFICATE OF SERVICE**

2 I, Margaret Branick-Abilla, certify that the following individual(s) was served with a copy of
3 the **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST**
4 **REQUEST)** on the date and via the method of service identified below:

5 **CM/ECF:**

6 Hannalore Burns Merritt
7 Email: hannalore@mydisabilityattorney.com
8 Attorney for Plaintiff

9 Hal Taylor
10 Email: haltaylorlawyer@gbis.com
11 Attorney for Plaintiff

12 Date: December 14, 2017

13 /s/ Margaret Branick-Abilla
14 MARGARET BRANICK-ABILLA
15 Special Assistant United States Attorney
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